

1 KARYN TAYLOR, ESQ., Bar #6142
kmtaylor@littler.com
2 LUKE W. MOLLECK, ESQ., Bar #14405
lmolleck@littler.com
3 LITTLER MENDELSON
200 South Virginia Street, 8th Floor
4 Reno, NV 89501
Telephone: (775) 348-4888
5 Facsimile: (775) 786-0127

6 Attorneys for Defendant
Prime Healthcare Services – Reno, LLC
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
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11 REBECCA BALLINGER,
12 Plaintiff,

13 vs.

14 PRIME HEALTHCARE SERVICES –
RENO, LLC, a Foreign Limited Liability
15 Company, dba St. Mary’s Regional
Medical Center.
16 Defendant.
17

Case No. 3:22-cv-00084-MMD-CLB

**STIPULATION TO EXTEND THE
DEADLINE TO FILE THE NOTICE OF
DISMISSAL**

[SECOND REQUEST]

18 Plaintiff REBECCA BALLINGER (“Plaintiff”) and Defendant PRIME HEALTHCARE
19 SERVICES – RENO, LLC (“Defendant”), by and through their undersigned counsel, hereby agree
20 and stipulate to extend the time for the parties to file the stipulation and order of dismissal from the
21 current deadline of February 15, 2023, up to and including March 17, 2023.

22 This is the second request for an extension of time to file the stipulation and order of dismissal.
23 This request is made in good faith and not for the purpose of delay. The parties have agreed to the

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1 terms of the settlement agreement. The additional time will allow the parties to execute the
2 settlement agreement and provide the consideration identified in the agreement.

3 Dated: February 8, 2023

Dated: February 8, 2023

4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ William J. Geddes

William J. Geddes, Esq.

7 Kristen R. Geddes, Esq.

The Geddes Law Firm, P.C.

8 *Attorneys for Plaintiff*

/s/ Luke W. Molleck

Karyn M. Taylor, Esq.

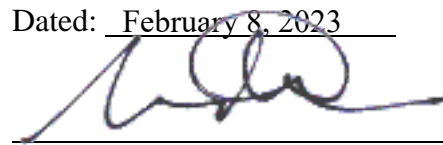
Luke W. Molleck, Esq.

Littler Mendelson P.C.

Attorneys for Defendant

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11 **IT IS SO ORDERED.**

12 Dated: February 8, 2023

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14 UNITED STATES DISTRICT JUDGE